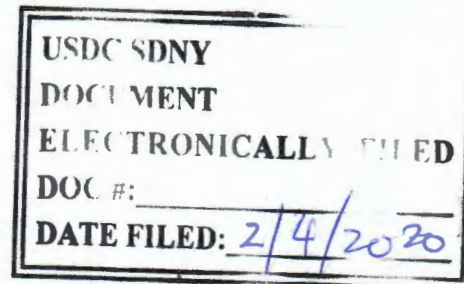
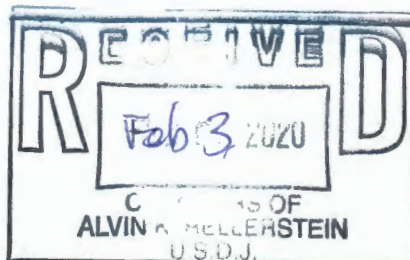


**WILSON ELSE**  
WILSON ELSE RICKENBACH WITZ EDENMAN & GUCKER LLP



January 31, 2020

Heather J. Austin  
215.606.3904 (direct)

Heather.Austin@wilsonelser.com

**Via ECF and Facsimile: (212) 805-7942**

Hon. Alvin K. Hellerstein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

*The conf is adjourned  
to March 27, 2020,  
10<sup>00</sup> am - 2-3-2020  
Alvin K. Hellerstein*

Re: First Reliance Standard Life Insurance Company v. Giorgio Armani Corp.  
United States District Court for the Southern District of New York  
Case No. 1:19-cv-10494-AKH  
Our File No: 13632.00413

Dear Judge Hellerstein:

I represent Plaintiff, First Reliance Standard Life Insurance Company and write to request an adjournment of the scheduled Rule 16 Case Management Conference. I provide the following in accordance with Section 1.D of your Individual Rules.

- i) **Original Conference Date: February 7, 2020;**
- ii) **Number of prior requests for adjournment or extension: Not applicable;**
- iii) **Whether the prior requests were granted: Not applicable;**
- iv) **Whether the adversary consents: Counsel for the Defendant has not yet appeared; however, he consents to this request;**
- v) **All other dates previously scheduled after the original date, including dates for conferences with the Court, and a suggested modified schedule agreed to by all other counsel: There are no other scheduled dates. The undersigned requests an adjournment of the conference until after counsel for Defendant has had an opportunity to appear and respond to the Complaint.**

By way of further explanation, First Reliance Standard initiated this lawsuit on November 12, 2019. Pursuant to Fed. R. Civ. P. 4(m), the deadline to perfect service is February 10, 2020. Counsel for Giorgio Armani has represented that his client will waive service of the Complaint and return the waiver by February 7, 2020 (the date of the scheduled Rule 16 Conference).

In accordance with the sixty (60) day response period allowed in the event of waiver, Defendant will not be required to appear and plead until March 9, 2020. Accordingly, the undersigned, with the consent of counsel for Defendant, requests an adjournment of the Rule 16 conference until Defendant has had an

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Hon. Alvin K. Hellerstein  
January 31, 2020

opportunity to appear and respond to the Complaint and the parties have had an opportunity to meet and confer in accordance with the pre-conference requirements.

Respectfully submitted,

Heather J. Austin

Wilson Elser Moskowitz Edelman & Dicker LLP

*/s/Heather J. Austin*

Heather J. Austin

cc: Matthew Kleiner (via e-mail: [mkleiner@grsm.com](mailto:mkleiner@grsm.com) and USPS First Class Mail)